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Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PAULA LANE; ANDRES PANIAGUA;
ELIZABETH HARRAH; ANGELA
KEHLER; GRETCHEN CASON; LORI
ROBERTSON; SPARKLE GREEN; and
ZAVIER KINVILLE, on behalf of themselves
and all others similarly situated, and UNITED
CEREBRAL PALSY ASSOCIATION OF
OREGON AND SOUTHWEST
WASHINGTON, INC.,

Plaintiffs,

v.

KATE BROWN, in her official capacity as the
Governor of the State of Oregon; ERINN
KELLEY-SIEL, Director of the Oregon
Department of Human Services; MARY LEE

Case No. 3:12-cv-00138-AC

DEFENDANTS' WITNESS DISCLOSURE

FAY, Administrator of the Office of
Developmental Disability Services; and
STEPHANIE PARRISH
STEPHANIE PARRISH TAYLOR,
Administrator of the Office of Vocational
Rehabilitation Services, all in their official
capacities,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

THE STATE OF OREGON,

Defendant.

Defendants reserve the right to call one or two witnesses at the July 21, 2022 hearing. If necessary, defendants may call Acacia McGuire-Anderson, the Employment First Coordinator at the Oregon Department of Human Services (DHS), and Keith Ozols, the director of Oregon DHS's Vocational Rehabilitation office. To the extent necessary, each will testify about measures taken to achieve substantial compliance with the settlement agreement in this action, as described in the State defendants' settlement report dated January 2022 and as described in data reports and other reports submitted in this matter.

DATED July 15, 2022.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/John J. Dunbar

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